

**DAVID J. HARRIS, ESQUIRE
ATTORNEY FOR DEBTOR
PA S. Ct. No.: 48558
FL Bar No.: 0451207**

69 Public Square, Suite 700
Wilkes-Barre, PA 18701
Telephone: (570) 823-9400
Facsimile: (570) 208-1400
E-Mail: dh@lawoffic eofdavidharris.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
RAE-ANN HANSELL, : Chapter 13
Debtor : Case No.: 5:17-bk-01347
:

**MOTION TO AMEND CHAPTER 13 PLAN
PLAN EXTENSION REQUEST DUE TO COVID-19 CRISIS**

The Motion of the above-named Debtor alleges:

1. Debtor's Chapter 13 Plan was confirmed on December 20, 2019, prior to the March 27, 2020 adoption of the CARES Act.
2. Debtor desires to amend her Chapter 13 Plan in order to extend the Chapter 13 Plan period to 84 months.
3. Debtor's extension request is due to a loss of household income suffered as a result of the COVID-19 crisis, in accordance with 11 U.S.C. §1329(d).
4. Debtor is hopeful that monthly income will return to normal by July, 2020, at which time the Amended Plan provides for a resumption in Plan payments.
5. By reason of the foregoing, Debtor proposes that pursuant to Sections 1329(a) and 1329(d) of the Bankruptcy Code, Debtor's Chapter 13 Plan be modified as set forth in the attached proposed Third Amended Chapter 13 Plan.

WHEREFORE, Debtor prays that this Motion be granted and that Debtor's Chapter 13 Plan be modified as set forth in this Motion.

Dated: June 25, 2020
Wilkes-Barre, Pennsylvania

RESPECTFULLY SUBMITTED:

BY: /s/ David J. Harris, Esquire
DAVID J. HARRIS, ESQUIRE